

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

CHARLESTON DIVISION

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IN RE: ETHICON, INC., PELVIC REPAIR
SYSTEMS PRODUCTS LIABILITY
LITIGATION

CIVIL ACTION NO. 2:12-MD-02327
MDL NO. 2327
Judge Joseph R. Goodwin

THIS DOCUMENT RELATES TO ALL CASES
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RULE 29 STIPULATION

**STIPULATION TO EXTEND TIME TO FILE MOTION(S) TO COMPEL RELATING
TO PLAINTIFFS' FIRST INTERROGATORIES AND
FIRST REQUEST FOR PRODUCTION**

The undersigned parties, by their respective counsel, hereby stipulate pursuant to Federal Rule of Civil Procedure 29, that Local Rule of Civil Procedure 37.1(c), which provides that motions to compel or other motions in aid of discovery not filed within 30 days after the discovery response or disclosure is due are waived, shall be extended for the purpose of allowing the parties to attempt in good faith to resolve their disputes relating to Plaintiffs' First Interrogatories to Defendants and First Request for Production of Documents to Defendants.

The parties agree that the period for filing motions to compel or other motions in aid of discovery shall be extended for 30 days after the parties' determination that they are unable to resolve their disputes as it relates to above-referenced discovery requests.

So stipulated this 6th day of November, 2012.

/s/ Donna Brown Jacobs
Attorneys for Defendants Johnson & Johnson and Ethicon, Inc.

/s/ D. Renee Baggett
Plaintiffs Co-Lead Counsel

I hereby certify that on this 6th day of November, 2012, the foregoing document was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

By: /s/ D. Renee Baggett

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